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11 *Vista Capital Management, LLC*
12

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15

16 DEBT REGISTRATION CENTER,
17 LLC; VISTA CAPITAL
18 MANAGEMENT, LLC,

19 Plaintiffs,

20 vs.

21 VIRTUE LAW GROUP, LLC a
22 NEW JERSEY LIMITED
23 LIABILITY COMPANY;
24 QUANTUM PROCESSING, LLC a
25 DELAWARE LIMITED
26 LIABILITY COMPANY; GABRIEL
27 A. LEVY; BENJAMIN
GREENWALD; MENDY RASKIN,

Defendants.

Case No.: 8:24-cv-01050-FWS-ADS

**AMENDED APPLICATION FOR
ENTRY OF DEFAULT AGAINST
DEFENDANTS VIRTUE LAW
GROUP, LLC, AND QUANTUM
PROCESSING, LLC**

[SUPPORTING DECLARATION OF
WILLIAM W. PALMER
CONCURRENTLY FILED
HEREWITH]

Complaint Filed: May 14, 2024
Hon. Judge Fred W. Slaughter

1 In response to this Court’s November 27, 2024 deficiency notice and order
2 [ECF Nos. 21, 22], plaintiffs Debt Registration Center, LLC (“Debt Registration”)
3 and Vista Capital Management, LLC (“Vista Capital”) (collectively hereafter,
4 “Plaintiffs”) respectfully state the following. First, as the Court noted the filing of
5 the First Amended Complaint (“FAC”) [ECF No. 17] was deficient for its failure to
6 include a Proof of Service with the FAC, which is now cured [ECF No. 23]. Second,
7 as stated in the Declaration of William W. Palmer in Support of Application for
8 Entry of Default Against Defendants Virtue Law Group and LLC, Quantum
9 Processing, LLC (“Palmer Decl.”) at ¶ 8, service was perfected on defendants Virtue
10 Law Group, LLC, and Quantum Processing, LLC (hereafter, “Defendants”) on
11 October 28, 2024. Third, as stated in the Palmer Decl., in paragraph 6, the parties
12 stipulated at defendants Virtue Law Group, LLC (“Virtue Law”) and Quantum
13 Processing, LLC (“Quantum Processing”) (collectively hereafter, “Defendants”) request to allow Defendants additional time to respond to the Complaint and to make
14 an appearance. Plaintiffs prepared the stipulation and necessary filing for
15 Defendants as a professional courtesy. Fourth, Defendants’ counsel would have
16 been required to register for the electronic service of CM/ECF. Finally, the FAC
17 Proof of Service is now filed with the Court [ECF No. 23]. Plaintiffs are diligently
18 moving their case forward. Defendants’ counsel has declined to accept service on
19 behalf of the three individual defendants Gabriel A. Levy; Benjamin Greenwald;
20 Mendy Raskin who are apparently unrepresented; therefore, Plaintiffs are preparing
21 to have these individuals personally served and will seek to recover the cost of the
22 unnecessary service when Defendants’ counsel appears on their behalf at a later date.
23 Regardless, in compliance with this Court’s November 27, 2024, deficiency notice
24 and order, Plaintiffs are requesting relief and the entry of default against Defendants
25 Virtue Law Group, LLC, and Quantum Processing, LLC.
26
27

1 Pursuant to Fed. R. Civ. P. 55(a), Plaintiffs respectfully ask this Court to enter
2 default against defendants Virtue Law Group, LLC and Quantum Processing, LLC.
3 The Complaint was filed on May 14, 2024 (Dkt. No. 1).

4 Plaintiffs served Quantum Processing on September 6, 2024, with the
5 Complaint, Summons, and Civil Cover Sheet. Defendants' Counsel Jason Lowe,
6 stipulated on behalf of Defendants Virtue Law and Quantum Processing on
7 September 27, 2024, to respond or answer the Complaint on or before October 27,
8 2024. *See* Palmer Decl., at ¶¶ 5-6.

9 Pursuant to Fed. R. Civ. P. 12(a)(1) the stipulated deadline for Defendants to
10 respond to the Complaint was October 27, 2024.

11 On October 24, 2024, Plaintiffs filed their First Amended Complaint ("FAC")
12 and added three new defendants Gabriel A. Levy, Benjamin Greenwald, and Mendy
13 Raskin.

14 Out of an abundance of caution, on October 28, 2024, Plaintiffs served the
15 FAC on Defendants' counsel Jason Lowe by electronic mail, along with the
16 Acknowledgment of Service forms on the three newly added defendants Gabriel A.
17 Levy, Benjamin Greenwald, and Mendy Raskin. Using the latest possible service
18 date on Defendants Virtue Law and Quantum Processing, the last day to respond to
19 the FAC was November 12, 2024. Attorney Lowe responded to the electronic
20 service of the FAC on October 31, 2024. *See* Palmer Decl., at ¶¶ 7-8, Exh A.

21 On November 11, 2024, Plaintiffs re-sent the Acknowledgement of Service
22 forms for the three newly added defendants. *See* Palmer Decl., at ¶¶ 8.

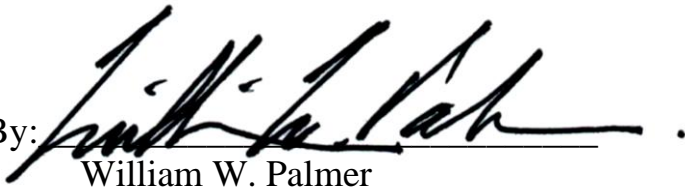
23 Defendants Virtue Law and Quantum Processing have not answered or
24 otherwise responded to either the Complaint or the FAC and (Dkt. No. 17) (Palmer
25 Decl. ¶¶ 9-10), despite having filed an appearance and stipulation by attorney Jason
26 Lowe on behalf of Defendants Virtue Law and Quantum Processing (Dkt. No. 16).

1 Plaintiffs are informed and believe that none of the individual Defendants are
2 minors, incompetent persons or are in military service. Palmer Decl. at ¶ 11.

3 Accordingly, entry of default against Defendants Virtue Law Group, LLC and
4 Quantum Processing, LLC is proper pursuant to Rule 55(a).

5 Dated: November 27, 2024 Respectfully submitted,

6 PALMER LAW GROUP, a PLC

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9 By: .
10 William W. Palmer

11 *Attorneys for plaintiffs Debt Registration Center,*
12 *LLC and Vista Capital Management, LLC.*

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CERTIFICATE OF SERVICE


I hereby certify that on November 27, 2024, I caused the foregoing:

- **AMENDED APPLICATION FOR ENTRY OF DEFAULT AGAINST DEFENDANTS VIRTUE LAW GROUP, LLC AND QUANTUM PROCESSING, LLC**
- **AMENDED DECLARATION OF WILLIAM W. PALMER IN SUPPORT OF PLAINTIFFS' APPLICATION FOR ENTRY OF DEFAULT AGAINST DEFENDANTS VIRTUE LAW GROUP, LLC AND QUANTUM PROCESSING, LLC**

to be served by CM/ECF and electronic mail to the following counsel for the Defendants:

Jason Lowe, Esq.
LAW OFFICES OF JASON LOWE
225 West 106th Street, 8M
New York, New York 10025
Email: jasonflowe@gmail.com

Executed on November 27, 2024, at Sacramento, California.



David Schlosser